

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CommScope, Inc., CommScope Inc. of
North Carolina, and CommScope
Technologies, LLC,) Civil Action No. 19-cv-15962-JXN-
Plaintiffs,)) LDW
v.))
Rosenberger Technology (Kunshan)
Co. Ltd., Rosenberger Asia Pacific) DECLARATION OF FARID
Electronic Co., Ltd., Rosenberger) FIROUZBAKHT IN SUPPORT
Technology LLC, Rosenberger USA) OF COMMSCOPE'S MOTION
Corp., Rosenberger North America) TO SEAL JOINT SUBMISSION
Pennsauken, Inc., Rosenberger Site) REGARDING PLAINTIFFS'
Solutions, LLC, Rosenberger) DISCOVERY ISSUE (DKT. 561)
Hochfrequenztechnik GmbH & Co.) AND UPDATED JOINT
KG, Northwest Instrument, Inc., and) SUBMISSION REGARDING
CellMax Technologies AB,) PLAINTIFFS' DISCOVERY
Defendants.) ISSUE (DKT. 562)

I, Farid Firouzbakht, declare as follows:

1. I am the Senior Vice President and President of Outdoor Wireless Networks at CommScope, Inc. (“CommScope”). CommScope’s base station antenna (“BSA”) products are part of its Outdoor Wireless Networks business. I make this Declaration in support of the parties’ Joint Motion to Seal (the “Motion”) in accordance with Local Civil Rules 5.3(c)(3) and 7.2 in connection with sealing portions of the materials submitted with the parties’ Joint Submission

Regarding Plaintiffs' Discovery Issue (Dkt. 561) and Exhibits thereto (Dkt. 561-1) and the parties' Updated Joint Submission Regarding Plaintiffs' Discovery Issue (Dkt. 562) and Exhibits thereto (Dkt. 562-2) (collectively, the "Identified Materials".)

2. The documents identified in the Consolidated Index submitted herewith should be maintained under seal on the Court's docket because each contains confidential, proprietary, and/or non-public information regarding, for example: (1) CommScope's hardware trade secrets; (2) CommScope's internal business operations; (3) CommScope's privilege log which reflects confidential, nonpublic information about the nature of confidential and sensitive communications with counsel and/or work product; and/or (4) discovery documents that the parties have deemed Confidential or Attorneys' Eyes Only under the Discovery Confidentiality Order entered by the Court (Dkt. 22).

3. Based upon my own knowledge, public disclosure of this information would cause clearly defined and serious injury to CommScope. The redacted portions of the material that CommScope seeks to seal are now narrowly tailored to material that discloses confidential, proprietary, and non-public information and/or information contained in discovery materials that have been designated Confidential or Attorneys' Eyes Only by the propounding party.

4. There are no objections to the Motion by the Defendants.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 30, 2023



Farid Firouzbakht